



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

**75 Hawthorne Street
San Francisco, CA 94105-3901**

MAY 15 2013

Attn: William Metz, Forest Supervisor
Cleveland National Forest Service
10845 Rancho Bernardo Road, Suite 200
San Diego, CA 92127-2107

Subject: Draft Supplemental Environmental Impact Statement for the Southern California National Forests Land Management Plan Amendment, Angeles National Forest, Cleveland National Forest, Los Padres National Forest, San Bernardino National Forest, Kern, Los Angeles, Orange, Riverside, San Diego, San Luis Obispo, Santa Barbara, San Bernardino, and Ventura Counties, California, [CEQ# 20130033]

Dear Mr. Metz:

The U.S. Environmental Protection Agency has reviewed the Draft Supplemental Environmental Impact Statement for the Southern California National Forests Land Management Plan Amendment. Our review and comments are provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The EPA reviewed the Draft and Final Environmental Impact Statements for the Southern California Forest Plan Revisions and provided comments to the U.S. Forest Service on August 23, 2004 and October 31, 2005, respectively. We rated the preferred alternatives in the 2004 Draft EIS as *Environmental Concerns – Insufficient Information* (EC-2) due to concerns about potential impacts to sensitive resources, the integration of fire use as a management tool, and funding associated with the implementation of monitoring plans and mitigation measures. The 2005 Final EIS addressed many of our concerns with the selection of the modified alternative, the designation of additional Research Natural Areas, more restricted motorized use on back country roads, and the decommissioning of unclassified roads.

We understand that the Draft SEIS has been prepared pursuant to a Settlement Agreement (December 15, 2010) that resulted from challenges to the Forest Service's decision to adopt the Land Management Plans (LMP) for the Angeles, Cleveland, Los Padres, and San Bernardino National Forests. The Draft SEIS considers the potential re-zoning of 37 Inventoried Roadless Areas (IRAs) identified in the Settlement Agreement, or portions thereof, to Recommended Wilderness (RW) or Back Country Non-Motorized (BCNM) use, and analyzes alternative monitoring protocols. The proposed action would change the zone allocations to BCNM use on approximately 300,000 acres and to RW on approximately 80,000 acres, resulting in a total of 471,617 acres designated as BCNM and 106,128 acres as RW.

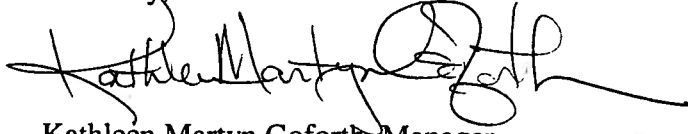
We commend the Forest Service, State, and Federal agencies and stakeholders for working together and utilizing a collaborative process to identify and resolve issues. We are pleased to see that the Draft SEIS provides more detailed information on the specified IRAs, including maps for each of the land use zone alternatives, as well as additional analysis specific to each of the IRAs, as described in Appendices 1 and 2, respectively.

Based on our review of the Draft SEIS, we have rated the document as *Lack of Objections* (LO). (See enclosed EPA Rating Definitions). EPA supports the Forest Service's plan to reclassify land use zone allocations in the Angeles, Cleveland, Los Padres, and San Bernardino National Forests. Allocating greater amounts of the study area to more restrictive land use zones, as proposed, should benefit sensitive resources by limiting future activities.

According to the Draft SEIS, certain commercial activities or uses – including oil and gas exploration and development, minerals resources exploration and development, and renewable energy development – may be allowed within BCNM areas by exception,¹ but are not allowed in RW areas (table 62). Such activities can have substantial impacts. We recommend that the Final SEIS identify the criteria or guidelines and decision-making process used in granting such exceptions, the likelihood of such exceptions being granted in the future, and the potential extent or cumulative impact to the forests.

We appreciate this opportunity to review the Draft SEIS. Please send one hard copy and one CD copy of the Final SEIS and the Record of Decision to my office when they are filed with our Washington D.C. Office. If you have any questions, please contact me at 415-972-3521, or contact Ann McPherson, the lead reviewer for this project. Ann can be reached at 415-972-3545 or mcpherson.ann@epa.gov.

Sincerely,



Kathleen Martyn Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of the EPA Rating System

Cc: Tom Contreras, Forest Supervisor, Angeles National Forest
Jody Noiron, Forest Supervisor, San Bernardino National Forest
Peggy Hernandez, Forest Supervisor, Los Padres National Forest
Bob Hawkins, Project Manager, Southern California National Forests

¹ By exception = Conditions which are not generally compatible with the land use zone but may be appropriate under certain circumstances (pg. 131).

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.